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s/b/m to CCO Mortgage Corp.

Hearing Date: **August 10, 2021,**  
**at 10:30am, in Courtroom 2,**  
**United States Bankruptcy**  
**Court, 900 Market Street,**  
**Philadelphia, PA 19107**

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:	Chapter 13 Proceeding
Angelique D. Bridges	
Debtor(s)	19-16106-MDC

**MOTION OF CITIZENS BANK, N.A. F/K/A RBS CITIZENS, N.A. S/B/M TO CCO  
MORTGAGE CORP. FOR RELIEF OF FROM THE AUTOMATIC STAY**

AND NOW, comes secured Creditor, Citizens Bank, N.A. f/k/a RBS Citizens, N.A. s/b/m to CCO Mortgage Corp. (Movant) by and through its counsel, Mary F. Kennedy, and files this Motion to obtain an order for Relief from the Automatic Stay due to lack of equity in debtor's property and debtor's failure to provide Movant with adequate protection of its interest in the property which is the basis of the creditor's security.

1. On or about September 27, 2019, Debtor filed a Chapter 13 Bankruptcy Petition.
2. On August 31, 2006, the debtor executed a Mortgage and Note to Movant in the amount of \$91,180.00 and secured by the property located at 4224 Levick Street, Philadelphia, PA 19135, referred to as the "property." Said Mortgage was recorded in the Philadelphia County Recorder of Deeds Office on October 19, 2006 at instrument no. 51554666. (See Exhibit "A" attached).
3. On June 14, 2017, Debtor and Movant entered into a Loan Modification Agreement. (See Exhibit "B" attached.)
4. The debtor is presently in arrears post-petition for two (2) months, June 1, 2021 to July 1, 2021. The total arrears including \$1,238.00 for attorney fees and costs is \$2,303.18.

5. Movant wishes to have the automatic stay terminated to permit Movant to complete foreclosure on its mortgage.
6. Pursuant to 11 U.S.C.A. section 362 (d) (1), cause exists to granted Movant relief from the stay.

WHEREFORE, Movant respectfully requests this Honorable Court ORDER:

That Relief from the Automatic Stay be granted to Citizens Bank, N.A. f/k/a RBS Citizens, N.A. s/b/m to CCO Mortgage Corp. to proceed with foreclosure action to obtain all other Relief available under Non-Bankruptcy Law. That the relief granted by the Court will survive the conversion of this bankruptcy case to a case under any other Chapter of the Bankruptcy Code. And that bankruptcy Rule 4001(a)(3) is not applicable and Movant is allowed to immediately proceed with foreclosure and all other relief available under the Non Bankruptcy law. Furthermore Movant respectfully requests that reasonable attorney fees and costs associated with this Motion be awarded to Movant

RESPECTFULLY SUBMITTED,

/s/ MARY F. KENNEDY, ESQ.

Dated: 7/12/2021